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October 19, 2018

VIA ECF

The Honorable Joan N. Ericksen
District Judge, District of Minnesota
United States District Court
12W U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415

RE: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 15-2666-JNE-FLN

Dear Judge Ericksen:

I am writing regarding Defendants' Fifteenth Motion to Dismiss for Failure to Comply with Pretrial Order No. 14 (Dkt. No. 1538). At yesterday's hearing, ruling on the Motion was withheld as to *Edwards v. 3M Co., et al.* (17-cv-04891), *Johnson v. 3M Co., et al.* (17-cv-05270), and *Billings v. 3M Co., et al.* (17-cv-05277), pending the Court's finding as to whether Plaintiffs' amended PFSs were served with improper copies (re-dated) of prior verification pages. As requested, the following documents are attached for the Court's review:

- Exhibit A1 is a true and correct copy of the verification page (dated May 19, 2018) served with the PFS for *Edwards* (17-cv-04891) on August 7, 2018.
- Exhibit A2 is a true and correct copy of the verification page (re-dated September 7, 2018) served with the most-recent PFS for *Edwards* (17-cv-04891) on September 11, 2018. Defendants assert that this is a photocopy of Exhibit A1 with the original date whited out.
- Exhibit B1 is a true and correct copy of the verification page (dated April 30, 2018) served with the PFS for *Johnston* (17-cv-05270) on August 7, 2018.
- Exhibit B2 is a true and correct copy of the verification page (re-dated September 7, 2018) served with the most-recent PFS for *Johnston* (17-cv-05270) on September 11, 2018.

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Defendants assert that this is a photocopy of Exhibit B1 with the original date and second signature block whited out.

- Exhibit C1 is a true and correct copy of the verification page (dated April 29, 2018) served with the PFS for *Billings* (17-cv-05277) on August 7, 2018.
- Exhibit C2 is a true and correct copy of the verification page (re-dated September 7, 2018) served with the most-recent PFS for *Billings* (17-cv-05277) on September 11, 2018. Defendants assert that this is a photocopy of Exhibit C1 with the original date and second signature block whited out.

Sincerely,

s/Benjamin W. Hulse

Benjamin W. Hulse

Attachments